



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2300

DATE SCANNED 10/20/11

SCANNER NO. 2

SCAN OPERATOR EE5

11092672699



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 2, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Acting Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *N*odi Wimsrip/Sari Pickerali *SP*  
Compliance Branch

SUBJECT: Reason to Believe Recommendation - Failure to File 48-Hour Notices  
under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000.00 or more received from the close of books for the Nevada 12 Day Pre-Primary Report up to 48 hours before the June 8, 2010 Primary Election in accordance with 2 U.S.C. § 434(a)(6) and 11 CFR. § 104.5(f). The committee, Chuck Flume for Congress, represents a candidate who lost the Primary Election. The committee is being referred for failing to file 48-hour notices for contributions totaling \$37,000.00.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor name, date of receipt and amount of the contributions for which a 48-hour notice was not filed.

In accordance with the schedule of civil money penalties outlined within 11 CFR § 111.44, this committee should be assessed the civil money penalty so indicated.

### **Recommendation**

1. Find reason to believe that Chuck Flume for Congress and Bruce Bloch, Treasurer, violated 2 U.S.C. § 434(a)(6) and make a preliminary determination that a civil money penalty of \$4,030.00 be assessed.
2. Send the appropriate letter.

### **Attachment**

11092672701

**Contributions for Which a 48-Hour Notice Was Not Received**

**AF: 2300**

**Committee ID: C00480434**

**Committee Name: Chuck Flume for Congress**

**Report Type: July Quarterly Report (5/20/2010 – 6/30/2010)**

**48-Hour Reporting Period: 5/20/2010 – 6/5/2010**

NGUYEN, TOI DR.	5/24/2010	\$1,000.00
O'CONNOR, GARY DR.	5/24/2010	\$1,000.00
CHUCK FLUME FOR CONGRESS	5/27/2010	\$23,000.00
CHUCK FLUME FOR CONGRESS	6/5/2010	\$12,000.00

**Proposed Civil Money Penalty: \$4,030.00 ((3 Notices Not Filed at \$110 each) + (10% of Overall Contributions Not Filed))**

Attachment 1

Attachment 1

11092672702

11092672703

3/2/2011 9:52 AM

Federal Election Commission  
Reason to Believe Circulation Report  
48-Hour Notification Report

AF#	Committee ID	Committee Name	State	Election	Candidate Name	Treasurer	Prev Violations	Notices Not Filed	LOA	Penalty
2300	C00460434	CHUCK FLUME FOR CONGRESS	NV	PRIMARY	FLUME, SR., CHARLES WILLIAM	BRUCE BLOCH	0	3	\$37,000	\$4,030

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - ) AF 2300  
Failure to File 48-Hour Notices under the )  
Administrative Fine Program )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 04, 2011, the Commission decided by a vote of 6-0 to take the following actions in AF 2300:

1. Find reason to believe that Chuck Flume for Congress and Bruce Bloch, Treasurer, violated 2 U.S.C. § 434(a)(6) and make a preliminary determination that a civil money penalty of \$4,030.00 be assessed.
2. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 4, 2011  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 4, 2011

Bruce Bloch, in official capacity as Treasurer  
Chuck Flume for Congress  
208 N. Ring Dove Drive  
Las Vegas, NV 89144

C00480434  
AF#: 2300

Dear Mr. Bloch:

The Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, *et seq.* ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate or the Federal Election Commission ("FEC"), and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* These notification requirements are in addition to all other reporting requirements. 2 U.S.C. § 434(a). Our records indicate that Chuck Flume for Congress did not submit 48-Hour Notices for contributions of \$1,000 or more, received between May 20, 2010 and June 5, 2010, totaling \$37,000, as required by 2 U.S.C. § 434(a)(6)(A). Attachment 1.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On March 4, 2011, the FEC found that there is Reason to Believe ("RTB") that Chuck Flume for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 C.F.R. § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$4,030. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 2. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. The amount of the civil money penalty is \$110 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$4,030 within forty (40) days of the finding, or by April 13, 2011.

11092672705

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or April 13, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Chuck Flume for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

11092672706



Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.45.

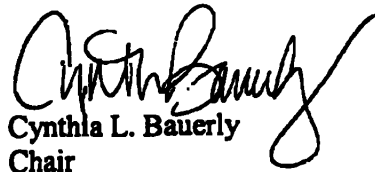
**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

  
Cynthia L. Bauerly  
Chair

11092672707

-----  
**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.44, the amount of your civil money penalty calculated at RTB is \$4,030 for the 2010 Primary Election 48-Hour Notification Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by April 13, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
-----

FOR: Chuck Flume for Congress

FEC ID#: C00480434

AF#: 2300

PAYMENT DUE DATE: April 13, 2011

PAYMENT AMOUNT DUE: \$4,030

11092672708

**Contributions for Which a 48-Hour Notice Was Not Received**

**AF: 2300**

**Committee ID: C00480434**

**Committee Name: Chuck Flume for Congress**

**Report Type: July Quarterly Report (5/20/2010 – 6/30/2010)**

**48-Hour Reporting Period: 5/20/2010 – 6/5/2010**

NGUYEN, TOI DR.	5/24/2010	\$1,000.00
O'CONNOR, GARY DR.	5/24/2010	\$1,000.00
CHUCK FLUME FOR CONGRESS	5/27/2010	\$23,000.00
CHUCK FLUME FOR CONGRESS	6/5/2010	\$12,000.00

**Proposed Civil Money Penalty: \$4,030.00 ((3 Notices Not Filed at \$110 each) + (10% of Overall Contributions Not Filed))**

11092672709

FEC OFFICE OF  
ADMIN REVIEW

2011 APR 13 P 0:11

*elect* **Chuck**  
**Flume**  
*for congress - district 1*

April 11, 2011

Federal Election Commission

Office of Administrative Review

999 E St. NW

Washington DC, 20463

Re: AF#: 2300

We are in receipt of your letter dated March 4, 2011 regarding non-filing of 48-hour notices. We have reviewed our records and agree that two of the contributions totaling \$2,000.00 went unreported. The May 27, 2010 and June 5, 2010 deposits of \$23,000.00 and \$12,000.00 were loans from the candidate and were not contributions so they were not reported as such.

I respectfully request abatement of the penalty assessed on the loans.

Please contact me if there are any questions or you need further information.

Sincerely,



Bruce Bloch, Treasurer

11092672710

**Missing 48-hour notices**  
**Chuck Flume for Congress (C00480434)**  
**July Quarterly Report (5/20/10 - 6/30/10)**  
**Primary Election 2010**  
**48 Hour Notice Period (5/20/10 - 6/5/10)**

CONTRIBUTOR NAME	DATE	AMOUNT
Nguyen, Toi	5/24/2010	\$1,000.00
O'Connor, Gary	5/24/2010	\$1,000.00
Chuck Flume for Congress	5/27/2010	\$23,000.00
Chuck Flume for Congress	6/5/2010	\$12,000.00

11092672711



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Via First Class Mail

April 18, 2011

Bruce Bloch, in his official capacity as Treasurer  
Chuck Flume for Congress  
208 N Ring Dove Drive  
Las Vegas, NV 89144

C00480434  
AF#: 2300

Dear Mr. Bloch:

On April 13, 2011, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in black ink, appearing to read "Dayna C. Brown".

Dayna C. Brown  
Reviewing Officer  
Office of Administrative Review

11092672712

2011 APR 14 P 1:26

Date: April 14, 2011

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW  
CHALLENGE RECEIVED**

AF#: 2300

Committee Name: Chuck Flume for Congress

Committee ID#: C00480434

Committee Address (if different than in RTB letter): N

Treasurer Name (if different than in RTB finding): N

**Attachments:**

Copy of RTB Circulation Report, dated March 2, 2011 and RTB Certification,  
dated March 4, 2011 (Y/N): Y

Attachment #: 1

Proof of Delivery (to be forwarded at inter date if not yet received) (Y/N): Y

Attachment #: 2

Other Relevant Telecoms (Y/N): N

Attachment #: N/A

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-2010 Nevada Primary Election Report Notice, dated May 3, 2010.

-RFAI Letter, dated October 14, 2010.

-RTB Letter dated March 4, 2011.

Attachment #: 4

Other RAD Information: (Y/N): N

Attachment#: N/A

11092672713

**Delivery Notification**

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

**Tracking Number:** 1Z WF5 860 A2 9139 751 9  
**Reference Number(s):** RAD  
**Service:** NEXT DAY AIR  
**Special Instructions:** ADULT SIGNATURE REQUIRED  
**Shipped/Billed On:** 03/04/2011  
**Delivered On:** 03/07/2011 9:23 A.M.  
**Delivered To:** 208 N RING DOVE DR  
LAS VEGAS, NV, US 89144  
**Signed By:** BLUME  
**Location:** RESIDENTIAL

Thank you for giving us this opportunity to serve you.

Sincerely,  
UPS

Tracking results provided by UPS: 03/07/2011 4:02 P.M. ET

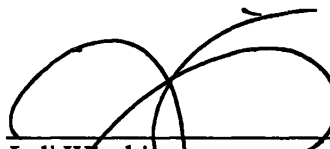
Attachment 2

11092672714



## DECLARATION OF JODI WINSHIP

1. I am the Acting Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Acting Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Chuck Flume for Congress:
  - A) Prior Notice, dated May 3, 2010, referencing the reporting requirements of 48-Hour Notices (sent via electronic mail to: [chuck@chuckflumeforcongress.com](mailto:chuck@chuckflumeforcongress.com));
  - B) Request for Additional Information Letter, dated October 14, 2010, referencing the missing 48-Hour Notices;
  - C) Reason-to-Believe Letter, dated March 4, 2011, referencing the missing 2010 48-Hour Notices.
3. I hereby certify that I have searched the Commission's public records and find that Chuck Flume for Congress filed the 2010 July Quarterly Report with the Commission on July 6, 2010 and has not filed the 2010 48-Hour Notices of Contributions.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 14th day of April, 2011.



Jodi Winship  
Acting Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission



# PRIMARY ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

NEVADA

May 3, 2010

## POLITICAL COMMITTEES INVOLVED IN THE PRIMARY (06/08/10):

REPORT	REPORTING PERIOD <sup>1</sup>	REGISTRATION DEADLINE	REPORT DUE DATE
Pre-Primary	04/01/10 - 05/19/10	05/24/10	05/27/10
48-Hour Notices	05/20/10 - 06/05/10	-- NV primary candidates only -- see filing info --	
July Quarterly	05/20/10 - 06/30/10	07/15/10	07/15/10

## WHO MUST FILE

The following committees must file the Nevada Pre-Primary Report:

- **Principal campaign committees** of congressional candidates (including unopposed candidates and candidates whose names do not appear on the ballot) who seek election in the primary election must file the above reports and notices.
- **PACs and party committees** filing on a quarterly basis in 2010 are subject to pre-election reporting if they make previously undisclosed contributions or expenditures (including independent expenditures) in connection with an election by the close of books of the applicable report(s).

Supplemental Filing Information is available:

- **Congressional Committees**
- **Parties and PACs**

**Additional information for Nevada Campaign Committees -- click here**

<sup>1</sup> These dates indicate the beginning and end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

## 2010 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

**PLEASE NOTE:** The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

### WHO MUST FILE

Principal campaign committees of congressional candidates <sup>1</sup> (including unopposed candidates and candidates whose names do not appear on the ballot) must file Quarterly Reports in 2010. <sup>2</sup>

Campaigns that raise or spend more than \$5,000 for the 2010 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2010, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

### METHODS OF FILING REPORTS

#### Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide for Congressional Candidates and Committees (Candidate Guide), pp. 82-84 [PDF]

#### Paper Filing - Meeting the Filing Deadline

Paper Report filing options – Registered, Certified or Overnight or First Class Mail.  
See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Candidate Guide, p. 81 [PDF]

---

<sup>1</sup> Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a).

<sup>2</sup> If a candidate has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 3Z [PDF].

## PRE- AND POST-ELECTION REPORTS

A committee whose candidate participates in a 2010 state primary, nominating convention or runoff election -- even if unopposed -- must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The campaign committee of a candidate who participates in the general election must file pre- and post-general election reports.

See 11 CFR 104.5(a)(2).

- Web Page: 2010 Congressional Pre-Primary Reporting Dates
- *The Record*: January 2010 issue [PDF]
- Candidate Guide, pp. 79-80 [PDF]

## COMPLIANCE

### Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.

See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, p. 7 [PDF]

### Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).<sup>3</sup>

See 11 CFR 111.30.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 81-82 [PDF]

## IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.<sup>4</sup> This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

## 2010 REPORTING SCHEDULE

- Web Page: 2010 Reporting Dates Page
- *The Record*: January 2010 issue [PDF]
- Candidate Guide, p. 79 [PDF]

<sup>3</sup> Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

<sup>4</sup> Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

#### **DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY**

Campaign committees must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,000 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(e).

- The Record: March 2009 issue [PDF]
- Federal Register: Notice 2009-03 (February 17, 2009) [PDF]; Notice 2010-02 (2/24/10) [PDF].

#### **SUPPLEMENTAL FILING INFORMATION NEVADA CAMPAIGN COMMITTEES ONLY**

#### **48 HOUR NOTICES ON CONTRIBUTIONS**

Notices are required if the committee receives any contribution (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee) of \$1,000 or more per source, during the period of May 20 through June 5, 2010.

The notices must reach the appropriate federal filing office within 48 hours of the committee's receipt of the contribution(s). **Campaign committees that file electronically MUST submit their 48-hour notices electronically.** See 11 CFR 104.5(f).

- Web Page: Link to Paper Forms (for downloading and printing)
- Form 6 Fax numbers
  - Senate campaigns (Secretary of the Senate): (202) 224-1851
  - House Campaigns (FEC): (202) 219-0174
- Campaign Guide: Candidate, p. 80 [PDF].

---

**FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100**

## 2010 SUPPLEMENTAL FILING INFORMATION PACs AND PARTY COMMITTEES

**PLEASE NOTE:** The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

### WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either quarterly or monthly reports in 2010. See 11 CFR 104.5(c). Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

### METHODS OF FILING REPORTS

#### Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e).

- Web Page: Electronic Filing Page
- Campaign Guide: Nonconnected Committees (Nonconnected), pp. 51-53 [PDF]; Corporations and Labor Organizations (SSF), pp. 49-51 [PDF]; Political Party Committees (Party), pp. 69-71 [PDF].

#### Paper Filing – Meeting the Filing Deadline

Paper report filing options – Registered, Certified or Overnight or First Class Mail.  
See 11 CFR 104.5(e).

- Web Page: Link to Paper Forms (for downloading and printing)
- Campaign Guide: Nonconnected, pp. 47-48 [PDF]; SSF, pp. 45-46 [PDF]; Party, p. 65 [PDF].

### PRE-ELECTION REPORTING

Quarterly filing committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: 2010 Congressional Pre-Primary Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

### 2010 REPORTING SCHEDULE

- Web Page: 2010 Reporting Dates Page
- The Record: January 2010 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

## COMPLIANCE

### Treasurer Responsibility

Committee treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceeding [PDF]
- Campaign Guide: Nonconnected, pp. 3-4 [PDF]; SSF, pp. 1-2 [PDF]; Party, pp. 6-7 [PDF].

### Administrative Fine Program

Failure to file reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- or non-filers). See 11 CFR 111.30.

- Web Page: Administrative Fine Program Page
- Campaign Guide: Nonconnected, pp. 48-49 [PDF]; SSF, p. 46 [PDF]; Party, p. 66 [PDF].

## DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Party committees and Leadership PACs must simultaneously file FEC Form 3L if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,000 during the covered period (see page 1 of this notice). See 11 CFR 104.22 and 110.17(e).

- The Record: March 2009 issue [PDF]
- Federal Register: Notice 2009-03 (2/17/09) [PDF]; Notice 2010-02 (2/24/10) [PDF].
- Campaign Guide: Party, pp. 143-149 [PDF]

## CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing and may change their filing frequency no more than once per calendar year. See 11 CFR 104.5(c).

- Web Page: Filing Frequency by Type of Committee
- Campaign Guide: Nonconnected, p. 51 [PDF]; SSF, p. 49 [PDF]; Party, p. 67 [PDF].

## 48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in 2010 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure. See 11 CFR 104.4.

- Web Page: 48- and 24-hour periods for independent expenditures for 2010 elections
- Campaign Guide: Nonconnected, pp. 72-74 [PDF]; SSF, pp. 65-67 [PDF]; Party, pp. 87-89 [PDF].

These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate.

---

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1180



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 14, 2010

Bruce Bloch, Treasurer  
Chuck Flume for Congress  
208 North Ring Dove Drive  
Las Vegas, NV 89144

**Response Due Date:**  
**November 18, 2010**

Identification Number: C00480434

Reference: July Quarterly Report (5/20/10 - 6/30/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. Column B figures for the Summary and Detailed Summary Page information should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for Line(s) 7(a), 7(c), 12, 13(a), 13(c), 16, 17, 22, and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals. (2 U.S.C. § 434(b))

2. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. If any contribution of \$1,000 or more was incorrectly

20080823022



reported, you must amend your original report with the clarifying information. (11 CFR § 104.5(f))

3. Your report discloses a negative ending cash balance of \$4,172.39. This suggests that you have overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please itemize this debt on Schedule D, show a zero balance on Line 8 of the Summary Page and include the amount on Line 10. If the negative ending cash balance is a result of an overdraft, it may constitute a prohibited bank contribution unless it is made on an account that has automatic overdraft protection with usual and customary interest rates and a definite repayment schedule. Please file an amendment to your report to accurately disclose your financial activities. (2 U.S.C. § 434(b)(8) and 11 CFR § 104.3(d))

4. Schedule B of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9)

5. Schedule C of your report discloses loans for which the source is the name of the committee, Chuck Flume for Congress. Please amend your report to clarify the source of the loans reported on Schedule C. (11 CFR §§ 100.52(a), 100.52(b), and 104.3(d))

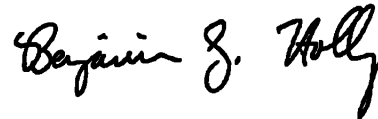
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

Chuck Flume for Congress  
Page 3 of 3

contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,



Benjamin J. Holly  
Campaign Finance Analyst  
Reports Analysis Division

417

1510992671664

Missing 48-hour notices  
Chuck Flume for Congress (C00480434)  
July Quarterly Report (5/20/10 - 6/30/10)  
Primary Election 2010  
48 Hour Notice Period (5/20/10 - 6/5/10)

CONTRIBUTOR NAME	DATE	AMOUNT
Nguyen, Toi	5/24/2010	\$1,000.00
O'Connor, Gary	5/24/2010	\$1,000.00
Chuck Flume for Congress	5/27/2010	\$23,000.00
Chuck Flume for Congress	6/5/2010	\$12,000.00

11090267225  
1003044560



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2011 APR 21 A 9:24

**SENSITIVE**

April 20, 2011

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Acting Staff Director

From: Patricia Carmona *PC*  
Chief Compliance Officer

Dayna C. Brown *DCB*  
Reviewing Officer  
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2300 – Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer (C00480434)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

11092672726



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 20, 2011

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2300 – Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer  
(C00480434)

**Summary of Recommendation**

Make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$4,030 civil money penalty.

**Reason-to-Believe Background**

On March 4, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for four contributions, including two Candidate loans, totaling \$37,000 for the 2010 Nevada Primary Election and made a preliminary determination that the civil money penalty was \$4,030 based on the schedule of penalties at 11 C.F.R. § 111.44. A letter, dated March 4, 2011, was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") requires that the principal campaign committee of a candidate must notify the Commission, in writing, of any contribution of \$1,000 or more received after the 20<sup>th</sup> day but more than 48 hours before an election. The principal campaign committee must notify the Commission within 48 hours of receipt of the contribution. The 48-hour notification shall be in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(A) and 11 C.F.R. § 104.5(f). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

**Respondents' Challenge**

On April 13, 2011, the Commission received the written response ("challenge") from the Treasurer who requests that the penalty assessed on the loans be abated. The Treasurer states that after reviewing their records, they agree that two of the contributions totaling \$2,000 were not reported, however, the May 27 and June 5 deposits were loans from the Candidate, not contributions. Included with the challenge is a check for \$310, which the Treasurer states is the amount of penalty for the two May 24 contributions that they did not report. Also included is a list of the four missing 48-Hour Notices the Commission provided to the respondents.

## Analysis

The respondents were notified of their obligation to file 48-Hour Notices more than two weeks before the 48-Hour Notice period began. Commission records show that on May 3, 2010, the Primary Election Report Notice, which includes the reporting requirements of 48-Hour Notices, was sent via email to "chuck@chuckflumeforcongress.com," the email address disclosed on their Statement of Organization. Page four of the Notice explains that 48-Hour Notices are required if the Committee receives any contributions (including loans from the Candidate) of \$1,000 or more per source, during the period of May 20 through June 5, 2010.

11 C.F.R. § 100.52(a) defines a contribution to be a gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. Given that Candidate loans are defined as contributions, 48-Hour Notices were required for the May 27 and June 5, 2010 Candidate loans of \$23,000 and \$12,000, respectively, as they both exceeded \$1,000 and occurred during the May 20 to June 5 48-Hour Notice window for the Nevada Primary.

The respondents failed to file 48-Hour Notices for four contributions, including two Candidate loans, totaling \$37,000, which were received on three days (May 24 and 27, and June 5, 2010); therefore, the respondents failed to file three 48-Hour Notices. Under the administrative fine regulations, the civil money penalty is \$110 plus 10% of the amount of the contributions not reported on a (or each) 48-Hour Notice. 11 C.F.R. § 111.44. The amount of the civil money penalty is, therefore,  $\$330 + (.10 \times \$37,000)$  or \$4,030. Thus, the penalty was calculated correctly at RTB.

Their challenge fails to address any of the three valid grounds for challenging enumerated at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. The Reviewing Officer, therefore, recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,030.

### OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2300 involving Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2300 that Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,030; and
- (3) Send the appropriate letter.

Reviewing Officer: Dayna C. Brown

### Attachments

- Attachment 1 – Challenge Received from Respondents
- Attachment 2 – Declaration from RAD
- Attachment 3 – Declaration from OAR

**DECLARATION OF DAYNA C. BROWN**

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The principal campaign committee of a congressional candidate must file notifications disclosing contributions of \$1,000 or more which are received between May 20 and June 5, 2010. These notifications (also called 48-Hour Notices) must be filed with the Federal Election Commission within 48 hours of the committee's receipt of the contribution(s).
3. I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
  - (a) Page 1 of the Statement of Organization filed by Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer. According to the Commission's records, the document is dated March 19, 2010, was received on April 7, 2010, and lists "chuck@chuckflumeforcongress.com" as the Committee's email address; and
  - (b) Page 1 of the Summary Page and 2 pages of Schedule A for the 2010 July Quarterly Report electronically filed by Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer. According to the Commission's records, the report covers the period from May 20 through June 30, 2010, and was received on July 6, 2010. Schedule A lists the receipt of 2 contributions and 2 loan totaling \$37,000.00 on May 24 and 27, and June 5, 2010. Each contribution and loan equals \$1,000 or more.
4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 20<sup>th</sup> of April, 2011.



---

Dayna C. Brown  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

11092672729

RECEIVED  
FEC MAIL CENTER  
2010 APR -7 AM 9:32

FEC  
FORM 1

STATEMENT OF  
ORGANIZATION

Office Use Only

1. NAME OF  
COMMITTEE (in full)

(Check if name  
is changed)

Example: If typing, type  
over the lines.

12FE4M5

CHUCK FLUME FOR CONGRESS

ADDRESS (number and street)

(Check if address  
is changed)

LAS VEGAS

NV

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

(Check if address  
is changed)

ChuckFlumeForCongress@gmail.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address  
is changed)

ChuckFlumeForCongress.com

2. DATE 03/19/2010

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT

NEW (N)

OR

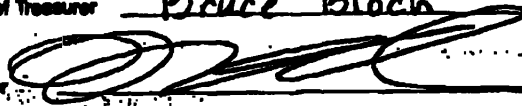
AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Bruce Bloch

Signature of Treasurer



Date 03/19/2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
Use  
Only

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9595  
Local 202-694-1100

FEC FORM 1  
(Revised 02/2008)

11092672730

10030281549



**FEC  
FORM 3****REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)USE FEC MAILING LABEL  
OR TYPE OR PRINT ▼Example: If typing, type  
over the lines

Chuck Flume for Congress

ADDRESS (number and street)

208 N Ring Dove Dr

Check if different  
than previously  
reported. (ACC)

Las Vegas

NV

89144

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00480434

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)

STATE ▼ DISTRICT

NV 01

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

X July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period 05 20 2010 through 06 30 2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Bruce Bloch

Signature of Treasurer Electronically Filed by Mr. Bruce Bloch

Date 07 06 2010

NOTE : Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office  
Use  
Only**FEC FORM 3**  
(Revised 02/2003)

FE5AN018

11092672731

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 5 / 12

(check only one)

<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	11d	<input type="checkbox"/>	12	<input type="checkbox"/>	13a	<input type="checkbox"/>	13b	<input type="checkbox"/>	14	<input type="checkbox"/>	15
-------------------------------------	-----	--------------------------	-----	--------------------------	-----	--------------------------	-----	--------------------------	----	--------------------------	-----	--------------------------	-----	--------------------------	----	--------------------------	----

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Chuck Flume for Congress

A.

Full Name (Last, First, Middle Initial)

Oliver Kinnunen

Mailing Address 5114 Lime Rd

City	State	Zip Code
Sebring	FL	33875

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
selfOccupation  
Dentist
 Receipt For: 2010  
☒ Primary General  
 Other (specify) ▼

Election Cycle-to-Date ▼

250.00

Date of Receipt

M	M	D	D	Y	Y	Y	Y
0	5	2	8	2	0	1	0

Transaction ID: SA11AI.4215

Amount of Each Receipt this Period

250.00

Contribution

B.

Full Name (Last, First, Middle Initial)

Dr. Toi Nguyen

Mailing Address 5188 Highland Road

City	State	Zip Code
Baton Rouge	LA	70808

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
selfOccupation  
Dentist
 Receipt For: 2010  
☒ Other (specify) ▼  
 05/24/2010

Election Cycle-to-Date ▼

1000.00

Date of Receipt

M	M	D	D	Y	Y	Y	Y
0	5	2	4	2	0	1	0

Transaction ID: SA11AI.4186

Amount of Each Receipt this Period

1000.00

Contribution

C.

Full Name (Last, First, Middle Initial)

Dr. Gary O'Connor

Mailing Address 4127 Kammel Road

City	State	Zip Code
La Crosse	WI	54601

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
Guaderson ClinicOccupation  
Dentist
 Receipt For: 2010  
☒ Primary General  
 Other (specify) ▼

Election Cycle-to-Date ▼

1000.00

Date of Receipt

M	M	D	D	Y	Y	Y	Y
0	5	2	4	2	0	1	0

Transaction ID: SA11AI.4192

Amount of Each Receipt this Period

1000.00

Contribution

SUBTOTAL of Receipts This Page (optional) ▶

2250.00

TOTAL This Period (last page this line number only) ▶

11092672732

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 7 / 12

(check only one)

11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	11d	<input type="checkbox"/>
12	<input checked="" type="checkbox"/>	13a	<input type="checkbox"/>	13b	<input type="checkbox"/>	14	<input type="checkbox"/>
						15	<input type="checkbox"/>

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Chuck Flume for Congress

A.

Full Name (Last, First, Middle Initial)

Chuck Flume for Congress

Mailing Address 208 N Ring Dove Dr

City	State	Zip Code
Las Vegas	NV	89144

FEC ID number of contributing  
federal political committee. C C00480434

Name of Employer

Occupation

Receipt For:	2010
X Primary	General
Other (specify) ▼	

Election Cycle-to-Date ▼
23000.00

Date of Receipt

M	M	/	D	D	.	Y	Y	Y	Y
0	5	/	2	7	.	2	0	1	0

Transaction ID: SA13A.4227

Amount of Each Receipt this Period
23000.00

Mailers

B.

Full Name (Last, First, Middle Initial)

Chuck Flume for Congress

Mailing Address 208 N Ring Dove Dr

City	State	Zip Code
Las Vegas	NV	89144

FEC ID number of contributing  
federal political committee. C C00480434

Name of Employer

Occupation

Receipt For:	2010
X Primary	General
Other (specify) ▼	

Election Cycle-to-Date ▼
35000.00

Date of Receipt

M	M	/	D	D	.	Y	Y	Y	Y
0	6	/	0	5	.	2	0	1	0

Transaction ID: SA13A.4228

Amount of Each Receipt this Period
12000.00

Mailers

SUBTOTAL of Receipts This Page (optional) ▶

35000.00

TOTAL This Period (last page this line number only) ▶

35000.00

11092672733



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

April 21, 2011

Bruce Bloch, in official capacity as Treasurer  
Chuck Flume for Congress  
208 N Ring Dove Drive  
Las Vegas, NV 89144

C00480434  
AF# 2300

Dear Mr. Bloch:

On March 4, 2011, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Chuck Flume for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to timely file 48-Hour Notices for four contributions, including two candidate loans, totaling \$37,000 for the 2010 Nevada Primary Election. The Commission also made a preliminary determination that the civil money penalty was \$4,030 based on the schedule of penalties at 11 C.F.R. § 111.44.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Dayna C. Brown  
Reviewing Officer  
Office of Administrative Review

Attachment

11092672734



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2011 MAY 17 P 3:41

**SENSITIVE**

May 17, 2011

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Acting Staff Director

From: Patricia Carmona *PC*  
Chief Compliance Officer

Dayna C. Brown *DCB*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2300 – Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer (C00480434)

On March 4, 2011, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for four contributions, including two Candidate loans, totaling \$37,000 for the 2010 Nevada Primary Election and also made a preliminary determination that the civil money penalty was \$4,030 based on the schedule of penalties at 11 C.F.R. § 111.44.

On April 13, 2011, the Commission received their written response ("challenge") from the Treasurer. After reviewing the challenge, the Reviewing Officer's recommendation dated April 20, 2011 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and assess a \$4,030 civil money penalty because they submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB or that they used best efforts to file on time. 11 C.F.R. § 111.35(b).

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

11092672735

**OAR Recommendations**

- (1) Adopt the Reviewing Officer recommendation for AF# 2300 involving Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2300 that Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,030; and
- (3) Send the appropriate letter.

11092672736

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Final Determination Recommendation: ) AF 2300  
Chuck Flume for Congress and Bruce )  
Bloch, in his official capacity as )  
Treasurer (C00480434) )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 26, 2011, the Commission decided by a vote of 6-0 to take the following actions in AF 2300:

1. Adopt the Reviewing Officer recommendation for AF# 2300 involving Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2300 that Chuck Flume for Congress and Bruce Bloch, in his official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$4,030.
3. Send the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

May 26, 2011  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

11092672737



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Bruce Bloch, in official capacity as Treasurer  
Chuck Flume for Congress  
208 N Ring Dove Drive  
Las Vegas, NV 89144

C00480434  
AF# 2300

Dear Mr. Bloch:

On March 4, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Chuck Flume for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file 48-Hour Notices for four (4) contributions, including two (2) candidate loans, totaling \$37,000 and received between May 20 and June 5, 2010. By letter dated March 4, 2011, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$4,030 in accordance with the schedule of penalties at 11 C.F.R. § 111.44. On April 13, 2011, the Office of Administrative Review received your written response, challenging the RTB finding, as well as a check in the amount of \$310.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Chuck Flume for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$4,030 in accordance with 11 C.F.R. § 111.44. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on April 21, 2011.

On May 26, 2011 the Commission adopted the Reviewing Officer's recommendation and made a final determination that Chuck Flume for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty in the amount of \$4,030. Given the \$310 payment remitted with the challenge in April, the remaining balance is \$3,720. A copy of the final determination recommendation is attached.

**If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or treasurer reside, or transact business, requesting that the final

11092672738



determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

#### **If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

#### **If You Choose To Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed form and payment to the address on page 3 within 30 days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Dayna Brown on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

On behalf of the Commission,



Caroline C. Hunter  
Vice Chair

Attachment

-----  
**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.44, the civil money penalty is \$4,030 for 2010 48-Hour Notices.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC # 979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
-----

FOR: Chuck Flume for Congress

FEC ID#: C00480434

AF#: 2300

FINAL CIVIL MONEY PENALTY: \$4,030

PAYMENT AMOUNT DUE: \$3,720

**ELECTRONIC CERTIFICATION AGREEMENT FOR  
DEBTS SUBMITTED TO THE FINANCIAL MANAGEMENT SERVICE'S  
CROSS-SERVICING PROGRAM**

This Agreement is submitted by: Federal Election Commission

Creditor Agency: Federal Election Commission

Date of Agreement: November 23, 2010

The Creditor Agency agrees that:

- 11092672741
- I. This Agreement covers all debts, including updates, changes, and modifications (Debts) submitted by Electronic Transmission on or after the date of this Agreement, by the above-named Creditor Agency (Agency) to the Financial Management Service (FMS), a bureau of the U.S. Department of the Treasury, for collection through FMS's Cross-Servicing Program (Cross-Servicing);
  - II. The Agency will submit Debts to Cross-Servicing via Electronic Transmission of "Add Records" or "Update Records," as described in the attached Exhibit A. Each time the Agency submits a Debt via an Add Record or Update Record, the Agency is certifying the Debt;
  - III. Any person who submits Debts via an Add Record or Update Record has or will have delegated authority to certify the Debts on behalf of the head of the Agency, and the Agency will provide a copy of this Agreement to any such person;
  - IV. By submitting Debts via an Add Record or Update Record, the person submitting such Debts is certifying to the U.S. Department of the Treasury, under penalty of perjury pursuant to 5 U.S.C. § 5514, 31 U.S.C. § 3716, 31 U.S.C. § 3720A, and 28 U.S.C. § 1746 that, to the best of his or her knowledge and belief, the following is true and correct:
    1. **Valid Debts.** The Debts are delinquent, valid and legally enforceable in the amounts stated. The Agency will properly credit collections (other than TOP collections) to the delinquent debtors' accounts and notify FMS of any chance in the amount, validity or legal enforceability of the Debt.
    2. **No Bar to Collection.** The Debts are not subject to any circumstances that legally preclude or bar collection, including collection by offset. There are no foreclosures pending with respect to any collateral securing a Debt. The Agency's records do not show that any debtor owing a Debt has filed for bankruptcy protection. Alternatively, the Agency can clearly establish that any automatic stay has been lifted or is no longer in effect.

3. ***Administrative Offset and Tax Refund Offset.*** If the Agency has established a profile instructing FMS to refer Debts to the Treasury Offset Program (TOP) on its behalf for the purposes of tax refund and administrative offset, the person submitting such Debts will be certifying to the following:

- a. The Agency has complied with all of the provisions of 31 U.S.C. § 3716, 31 U.S.C. § 3720A, 31 C.F.R. §§ 285.2 and 285.5, and the Federal Claims Collection Standards (31 C.F.R. Parts 900-904), as may be amended, as well as other statutes, regulations and policies applicable to collection by administrative offset and tax refund offset.
- b. At least 60 days prior to the date of the certification (i.e., date of Electronic Transmission), the Agency has provided, or made a reasonable attempt to provide in accordance with applicable offset regulations, each debtor with:
  - i. written notification, at the debtor's most current known address, of the nature and the amount of the Debt, the intention of the Agency to collect the Debt through administrative offset and tax refund offset, including offset of State payments, and an explanation of the rights of the debtor;
  - ii. an opportunity to inspect and copy the records of the Agency with respect to the Debt;
  - iii. an opportunity for review within the Agency of the determination of the Agency with respect to the Debt, including the opportunity to present evidence that all or part of the Debt is not past-due or legally enforceable; and
  - iv. an opportunity to enter into a written repayment agreement with the Agency
- c. The Agency has considered any evidence presented by the debtor and determined that the amount of the Debt is past-due and legally enforceable and there are no pending appeals of such determination.
- d. The Agency has, at minimum, made the following reasonable efforts to obtain payment of the Debt: demanded payment and provided the debtor with the notice and opportunities described in paragraph 3.b.

- e. For Debts outstanding more than ten years on or before **December 31, 2009**, the notice described in paragraph 3.b. was sent to the debtor after the Debt was outstanding for more than ten years, and that the debtor was afforded the rights described in paragraphs 3.b. – 3.d. at that time. This requirement does not apply to any Debt that could be collected by offset without regard to any time limitation prior to **December 31, 2009** (e.g., student loans debts, judgments).
4. ***Due Process Compliance for Salary Offset.*** With respect to the offset of Federal salaries, if the Agency has authorized FMS to set up an agency profile so that all debts are referred to TOP for offset of federal salary payments:
- a. The Agency has complied with all of the provisions of 5 U.S.C. § 5514, 5 C.F.R. §§ 550.1101-1110, and 31 CFR § 285.7, as may be amended, as well as other statutes, regulations and policies applicable to collection by salary offset.
- i. The Agency has provided, or made a reasonable attempt to provide, each debtor with the notice, opportunities, and considerations described in paragraphs 3.b., 3.c. and 3.e (if applicable) and the additional notices and opportunities, including the opportunity for waiver consideration and for a hearing, required for salary offset.
5. ***Consumer Reporting Agencies.*** The Agency has complied with all of the provisions of 31 U.S.C. § 3711(e) and the Federal Claims Collection Standards, as well as other statutes, regulations and policies applicable to the Agency's reporting of delinquent debts to consumer reporting agencies. The Agency has:
- a. determined that the debts are valid and overdue;
- b. notified the debtor, more than 60 days prior to the date of the certification:
- i. that the debt is overdue,
- ii. that the Agency intends to disclose to a consumer reporting agency that the debtor is responsible for the debt,
- iii. of the specific information to be disclosed to the consumer reporting agency, and
- iv. of the debtor's rights to an explanation of the claim, to dispute the information in the Agency's records about the claim, and to

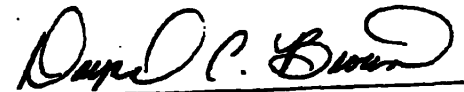
administrative repeal or review of the claim; and

- c. upon the request of a debtor, provided for a review of any debtor's claim, including an opportunity for reconsideration of the initial decision on the claim.

In addition, no debtor has repaid or agreed to repay the claim under a signed repayment agreement or filed for review of the claim.

- d. ***Interest and Penalties.*** The Agency has complied with all of the provisions of 31 U.S.C. § 3717 and the Federal Claims Collection Standards, as well as other statutes, regulations and policies applicable to Agency's assessment of interest, penalties and administrative costs. The Agency has mailed or hand-delivered a written notice to all debtors explaining the Agency's requirements concerning the charges.

**CERTIFICATION:** Pursuant to 28 U.S.C. § 1746, I certify that I have been delegated authority to execute this Agreement on behalf of the head of my agency.



Dayna C. Brown

Director, Office of Administrative Review



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2300

DATE SCANNED

10/20/14

SCANNER NO.

2

SCAN OPERATOR

EZJ

11092672745